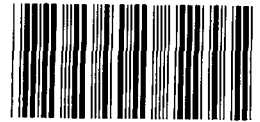


SEPT 1992

7184  
CONSENT TO ACCESS

FILE PLAN

2.0



335378

UNITED PARK CITY MINES COMPANY ("UPCMC"), owner of the property known as Richardson Flat Tailings, located in the NW1/4, Section 1, Township 2 South, Range 4 East, Summit County, Utah (the "Site"), agrees to allow the employees and other authorized representatives of the United States Environmental Protection Agency ("EPA") and of the Utah Department of Environmental Quality ("UDEQ") (collectively the "Government Representatives") to enter upon the Site on the dates of June 23, 1992 through and including June 27, 1992, after meeting with UPCMCM personnel at 8:00 am on June 23, 1992, at the junction of Highways U 248 and US 40, solely for the purpose of the installation of monitoring wells at the Site pursuant to the "QA/QC Sampling Plan," dated May 28, 1992, and prepared by Ecology and Environment, Inc., for the Site.

No testing shall be conducted at the Site and no samples, of any type, shall be taken from or about the Site; however, if any samples were to be taken, UPCMCM would be provided with splits of each sample taken, would be given a receipt describing each sample taken, and would be promptly furnished with a copy of the results of any analysis made of samples taken.

It is understood that the Government Representatives shall notify UPCMCM in writing of the names, titles and employers of the individuals who will be entering onto the Site prior to their entry.

It is understood that the Government Representatives shall promptly provide UPCMCM with copies of any and all photographs taken of the Site and of any final report made or data collected from the above-described activities.

The Government Representatives shall be accompanied by UPCMCM personnel at all times while the Government Representatives are on the Site. Prior to the Government Representatives' entry upon the Site, the Government Representatives shall meet with UPCMCM personnel at 8:00 am on June 23, 1992, at the junction of Highways U 248 and US 40 and then proceed to the Site.

UPCMCM understands that the above-described activities by the EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604. As of this date, UPCMCM, in giving this consent, is not responding to any threats nor is it relying upon any additional promises, representations or claims, either oral or written, made by any Government Representative, other than the understandings specified in this Consent to Access.

The officer of UPCMCM who signs this Consent to Access on behalf of UPCMCM is authorized to sign on behalf of UPCMCM.

UNITED PARK CITY MINES COMPANY

June 23, 1992  
(Date)

BY:

*E. L. Quinn*

Its

*Signature*

RJB:060192a

## CONSENT TO ACCESS

United Park City Mines Company ("UPCMC"), owner of the property known as Richardson Flat Tailings, located in the NW 1/4, Section 1, Township 2 South, Range 4 East, Summit County, Utah, (the "Site") hereby consents and grants access to the officers, employees, and authorized representatives of the United States Environmental Protection Agency ("EPA") and the Utah Department of Environmental Quality ("UDEQ") (collectively, the "Government Representatives") to the Site for the purposes of conducting those activities described in the "QA/QC Sampling Plan", dated May 28, 1992 prepared by Ecology and Environment, Inc., which activities shall include:

1. the taking of soil, surface water, ground water and air samples;
2. the drilling of holes and installation of monitoring wells for subsurface investigation; and,
3. other actions reasonably related to the investigation of surface or subsurface contamination at the Site.

UPCMC will be allowed to take splits of each sample taken, except for air samples, and will be given a copy of the results of any analysis made of samples taken. In the event that UPCMCM would like to obtain duplicate air samples, the Government Representatives will provide such upon request.

The Government Representatives shall notify UPCMCM of the names and titles of the individuals who will be entering onto the Site prior to their entry.

It is understood that the Government Representatives shall promptly provide UPCMCM with copies of any and all photographs taken of the Site and of any final report made or data collected from the above-described activities which are part of the public record.

UPCMCM realizes that these actions by the EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C § 9604. In giving this consent, UPCMCM is not responding to any threats nor is it relying upon any additional promises, representations or claims, either oral or written, made

by any Government Representative, other than the understandings specified in this Agreement.

UNITED PARK CITY MINES COMPANY

By Its Authorized Representative

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Title)



309 KEARNS BUILDING  
SALT LAKE CITY, UTAH 84101

Phone Number: (801)532-4031  
Fax Number: (801)355-8549

Date	6/18/92
Sender	E. Osika

Please deliver the following page(s) to:

Name	Mike Zimmerman
Company	E.P.A.
Fax Number	303-293-1238

Total Number of Pages (including cover page):	3
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Comments or Special Instructions:


If you have trouble receiving this transmission, please call:

\_\_\_\_\_ at (801) 532-4031



309 KEARNS BUILDING  
SALT LAKE CITY, UTAH 84101

RECEIVED

92 JUN 18 PM 12:06

U.S. EPA, REGION VIII  
EMERGENCY RESPONSE BRANCH

June 15, 1992

Mr. Mike Zimmerman, Environmental Protection Specialist  
U. S. Environmental Protection Agency  
Region VIII (8HWM-HR)  
999 18th Street, Suite 500  
Denver, Colorado 80202-2405

Dear Mr. Zimmerman:

Pursuant to our telephone conversation of this afternoon, I am enclosing a revised Consent to Access for the purpose of installation of three monitoring wells for the period of June 23 through and including June 27, 1992. This revised Consent to Access reflects your request to extend the period from three days to five days.

I will hand-deliver this Consent to Access when we meet your representatives on the morning of June 23, 1992.

As with the air sampling which has already been completed, our consultants will be on site for the installation of the three monitoring wells and we hope that there will not be any delays like that which we experienced with the air sampling. Such delays are counter-productive and, because our consultants are from out of state, result in wasted time and unnecessary costs to us.

Yours truly,

A handwritten signature in black ink, appearing to read "Edwin L. Osika, Jr.", is written over a horizontal line.

Edwin L. Osika, Jr.  
Executive Vice President

elo:amw61592

encl. (1)

cc: Rosemary J. Beless



309 KEARNS BUILDING  
SALT LAKE CITY, UTAH 84101

RECEIVED

JUN 18 PM 12:06

U.S. EPA. REGION VIII  
EMERGENCY RESPONSE BRANCH

June 15, 1992

Mr. Mike Zimmerman, Environmental Protection Specialist  
U. S. Environmental Protection Agency  
Region VIII (8HWM-ER)  
999 18th Street, Suite 500  
Denver, Colorado 80202-2405

Dear Mr. Zimmerman:

As previously discussed with you, it is United Park City Mines Company's business judgment to issue individual Consents to Access for specific dates rather than issuing one blanket Consent. Accordingly, I am enclosing a Consent to Access for the purpose of installation of monitoring wells for the period of June 24 through June 26, 1992 pursuant to the QA/ QC Sampling Plan, dated May 25, 1992.

If the Consent is agreeable to you, please advise and I will hand-deliver it when we meet your representatives on the morning of June 24, 1992 at the site.

Please be advised that I am forwarding an additional letter to you confirming other sampling dates and submitting some comments upon the above mentioned Sampling Plan.

Yours truly,

A handwritten signature in cursive script, appearing to read "Edwin L. Osika, Jr.", written in dark ink.

Edwin L. Osika, Jr.  
Executive Vice President

encl. (1)

elo:asp/926



309 KEARNS BUILDING  
SALT LAKE CITY, UTAH 84101

June 18, 1992

Mr. Mike Zimmerman, Environmental Protection Specialist  
U. S. Environmental Protection Agency  
Region VIII (8HWM-ER)  
999 18th Street  
Denver, Colorado 80202-2405

Dear Mr. Zimmerman:

Enclosed is the finalized Consent to Access for the installation of monitoring wells for the period of June 23 through and including June 27, 1992 as agreed upon by our respective attorneys and as approved by me.

Yours truly,

A handwritten signature in dark ink, appearing to read 'Edwin L. Osika, Jr.', is written over the 'Yours truly,' text.

Edwin L. Osika, Jr.  
Executive Vice President

ELO,Jr./mwaces

RECEIVED  
JUN 22 1992  
REGIONAL OFFICE  
SALT LAKE CITY  
URGENT

CONSENT TO ACCESS

UNITED PARK CITY MINES COMPANY ("UPCMC"), owner of the property known as Richardson Flat Tailings, located in the NW1/4, Section 1, Township 2 South, Range 4 East, Summit County, Utah (the "Site"), agrees to allow the employees and other authorized representatives of the United States Environmental Protection Agency ("EPA") and of the Utah Department of Environmental Quality ("UDEQ") (collectively the "Government Representatives") to enter upon the Site on the dates of June 23, 1992 through and including June 27, 1992, after meeting with UPCMCM personnel at 8:00 am on June 23, 1992, at the junction of Highways U 248 and US 40, solely for the purpose of the installation of monitoring wells at the Site pursuant to the "QA/QC Sampling Plan," dated May 28, 1992, and prepared by Ecology and Environment, Inc., for the Site.

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It is understood that the Government Representatives shall notify UPCMCM in writing of the names, titles and employers of the individuals who will be entering onto the Site prior to their entry.

It is understood that the Government Representatives shall promptly provide UPCMCM with copies of any and all photographs taken of the Site and of any final report made or data collected from the above-described activities.

The Government Representatives shall be accompanied by UPCMCM personnel at all times while the Government Representatives are on the Site. Prior to the Government Representatives' entry upon the Site, the Government Representatives shall meet with UPCMCM personnel at 8:00 am on June 23, 1992, at the junction of Highways U 248 and US 40 and then proceed to the Site.

UPCMCM understands that the above-described activities by the EPA are undertaken pursuant to its response and enforcement responsibilities under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604. As of this date, UPCMCM, in giving this consent, is not responding to any threats nor is it relying upon any additional promises, representations or claims, either oral or written, made by any Government Representative, other than the understandings specified in this Consent to Access.

The officer of UPCMCM who signs this Consent to Access on behalf of UPCMCM is authorized to sign on behalf of UPCMCM.

UNITED PARK CITY MINES COMPANY

\_\_\_\_\_  
(Date)

BY: \_\_\_\_\_

Its \_\_\_\_\_

RJB:060192a

COPY  
FOR YOUR FILE





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

May 14, 1992

MEMORANDUM

TO: Floyd Nichols, Chief  
Response Section

FROM: Mike Zimmerman, OSC *Mike Zimmerman*

SUBJECT: Sample Scoping Visit - April 29, 1992  
Richardson Flats, Park City, Utah

In accordance with the "Make Sites Safe Initiative", ERB and SF Remedial initiated the assessment process to determine if Richardson Flats, a proposed NPL Site is safe. To further the process it was deemed prudent to conduct a scoping visit to the site for purposes of familiarizing EPA, State of Utah, and the PRP with the pending site assessement. On April 29, 1992, the following representatives toured the site:

EPA

Mike Zimmerman, OSC  
Steve Hawthorn, OSC  
Mike McCeney, RPM  
Rick Baird, Attorney-ORC

TAT

Scott Keen, TAT Team Leader  
Gayle Crockett, TAT Member

State of Utah

Harold Sanbeck, RPM

United Park City Mines

Edwin L. Osika, Ex.VP  
Kerry Gee, Geologist  
Rosemary J. Beless, Attorney  
(Fabian & Clendenin)  
Two Other UPCM Consultants (names unknown)

Weather - About 50 Degrees F w/partly cloudy conditions and winds in the 10 mph range (estimates).

Site Observations/Actions

The inspection party convened at 0800 hrs. beneath the underpass of US 40 and Utah Highway 248 with the introduction of individual and discussions pertaining to the purpose of visit. Proceeding from the meeting point, the party traveled in a caravan of three vehicles around the perimeter of the property, beginning with the northern boundry of the site. The entire site is fenced with fencing constructed to define roadway boundaries, or to restrict access in reaches of the site not adjacent to a

3 35154  
W. Wang.

*Thomson is the 1st time d've heard of the Prospector. Square influence. We'll talk some more after you data is in.*

county of state highway. Silver Creek and the abandoned railroad have been fenced and the approach to the old railroad tracks has been barricaded to restrict access. Most of the fencing is similiar to highway right-of-way fencing; one strand of barb wire atop 42" of hog wire fencing with driven metal posts. One access gate (lock and key) is available on the southern boundary of the site. Certain reaches on the northern perimeter have temporary fencing constructed because of differences of legal opinion over right-of-way between the PRP and the entity responsible for construction of US 40. This fencing looks sufficient to keep out the unwanted guest. The PRP has posted "Keep Out" signs at many points around the perimeter the site. It appears that the PRP has diligently tried to restrict access to the site.

The party moved (on foot) to the wetlands area and the tailings dam. The monitoring wells were observed along with the tailings dam. It was learned that the dam was engineered by Dames and Moore. One of the monitoring wells can no longer be located. No weeps or springs in the tailings dam area were observed. The marsh grasses had yet to spring to life and were awaiting warmer weather.

Next the party walked the alignment of the diversion ditch and observed an area where the ditch appeared to pond water. It was obvious that wildlife is taking to the vegetation rich oasis. Next an area that has been utilized for refuse disgard of inert materials (large rocks, used machinery) was observed. This area apparently was identified as a landfill on previous aerals as was another localized area that was observed with discarded inert material. Eliminating these from the sampling plan should simplify the task of site sampling. Additionally, it was obvious that the hydraulic flow within the channel is intermittent and greatly dependent upon storm event and snow melt run-off. Additionally, the extent of soil covering the tailings could only be partially observed. The PRP is attempting to cover the tailings with fill and plant grasses adapted to the climate for fugutive dust suppression. It appeared that wheat grass and/or alfalfa/clover was being systemically planted on site. The PRP stated that 85% of the site had been covered/planted and they continue to work on vegetation as resources are available.

The site of the municipal landfill within Richardson Flats was toured next while noting that the landfill operated for approximately 12 years (1974-1986) by Park City under a lease arrangement with UPCM. Apparently the facility was permitted by the State of Utah and was designated for municipal purposes. The route of the new highway split the landfill in half, north-to-south. While some previous reports/aerals indicate stained soils in photos, it was not apparent that leaching of the landfill material was occurring. Monitoring wells in this general area were discussed with the TAT. More information will

need to be developed as to the impact of the landfill on Silver Creek.

The flood plain and Silver Creek were viewed as the last points-of-interest. The PRP drew attention to their belief that contamination is migrating down Silver Creek from Prospector Square and being depositing in the flood plain. On the surface, the soils looked very typical (western soils) with salt deposits discoloring naturally occurring soil strata. However, sampling of soil, surface waters, groundwater, and sediments would give a more detailed description of possible contaminant migration from the site in this general area. Flow of Silver Creek may be intermittent during summer low-flow months. The PRP stated that the stream did not "officially" support a cold water fishery, however, as the party was crossing an old bridge to go off-site, a nice pan-sized trout (about 1' long) was observed swimming in Silver Creek.

The tour concluded at approximately 1045 hrs. with the OSC restating the purpose of the trip and the future sampling effort ("Make Sites Safe Initiative"). A course of action was discussed with the PRP in terms of future sampling efforts. EPA would send aerial photos and the sampling plans to the PRP to keep them informed of pending efforts. The RPM's (EPA/UDEQ) discussed with the PRP future remedial work and the need to coordinate. Once the sampling plan is prepared and is approvable, EPA would approach the PRP for site access. A tentative late May - early June sampling date was suggested. The PRP demonstrated a cooperative nature as did all state/federal government representatives.

cc: Rich Baird, ORC  
Mike McCeney, RPM  
Harold Sanbeck, UDEQ RPM  
TAT